

**REMARKS**

Claims 17-23, 25-27, and 86-97 are all the claims pending in the application.

**Preliminary Remarks**

Applicant thanks the Examiner for acknowledging the claim to foreign priority.

However, the Examiner is respectfully requested to confirm the receipt of the certified copy of the priority documents by checking box 13-a-2, thereby indicating that the certified copy of the priority documents has been received in the parent application, Application No. 09/121,860.

Claims 17-19, 21-23, 26-27 and 86-97 are allowed and claims 20 and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by a newly found reference, US Patent No. 6,360,262 to Guenther et al. (hereinafter "Guenther") and as being anticipated by another newly found reference, US Patent No. 6,647,509 to Ichinohe (hereinafter "Ichinohe"). Applicant respectfully requests the Examiner to withdraw these rejections of claims 20 and 25 in view of the following comments.

**Anticipation by Guenther**

Applicant files herewith a verified English-language translation of one of the Japanese priority documents (Japanese Application No. 9-239395), which fully support the rejected claims. Specifically, claims 20 and 25 are respectfully submitted to be fully supported by the Japanese priority document. The filing of the English-language translation perfects Applicant's claim to benefit from the foreign priority date of September 4, 1997 with respect to all of Applicant's claims 20 and 25. In view thereof, and since the earliest effective date of the

Guenthner patent as a reference is its U.S. filing date of November 24, 1997 (which is later than September 24, 1997), Guenthner is removed as a reference.

This rejection of claims 20 and 25 is based on Guenthner. Since Guenthner is not a prior art reference, the rejection is thus literally moot. Applicant therefore respectfully requests the Examiner to withdraw this rejection.

Anticipation by Ichinohe

Next, the Examiner alleges that Ichinohe anticipates claims 20 and 25. In particular, the Examiner alleges that col. 10, lines 50 to 58 teaches the present invention, as set forth in claims 20 and 25 (see page 3 of the Office Action). Col. 10, line 50 to col. 11, line 4 recite:

The address system of the internet work apparatus (router in the embodiment) is now described.

In the present invention, each port includes first address information (IP address) of a network layer composed of a network number peculiar to a network connected to the port and a host number peculiar to the port and second address information (MAC address) of a physical layer peculiar to the port, emphasis added. The apparatus of the embodiment includes a relay IP address and a relay MAC address common to both the routers 11 and 12 in addition of the IP address and the MAC address peculiar to each of the routers 11 and 12. A relay IP address and a relay MAC address common to both the routers are defined in the port of the routing module of the current router for connection to an external terminal.

In the embodiment, the relay IP address and the relay MAC address are always used as the IP address and the MAC address of the port of the

router operating as the current system and the IP address and the MAC address peculiar to the ports are used for the ports of the router of the standby system, emphasis added.

As recited above, Ichinohe teaches two routers, each router having a number of ports, where each port is connected to a different network (Fig. 1A; col. 7, lines 38 to 49; col. 10, lines 50 to 58, col. 35, lines 46 to 49) . As a result, each port of the router must have a separate IP address because it is connected to a different network.

In other words, Ichinohe's router has one IP address for one network. Ichinohe clearly fails to teach or suggest receiving a communications message from a network at any one of a plurality of IP addresses. In Ichinohe, a message from a network will always go to one predetermined IP address (the IP address of the port assigned to that network). Why? As noted in the recited passage above, each port has its own physical MAC address, which means that each port is physically connected by a cable or similar means to the assigned network. However, irregardless of the reasons, Ichinohe fails to disclose, teach or suggest that a message from a particular network may arrive to any one of a plurality of IP addresses. In short, Ichinohe teaches a router with an IP address for each port but only one IP address for a network.

Ichinohe also teaches that the router will have a relay IP address and an inherent/peculiar IP address (col. 10, lines 58 to 65). With respect to this teachings of Ichinohe, it is respectfully pointed out that the signal will be received only through the relay IP. Inherent/peculiar IP address is to prevent the router from receiving data, to disable the router and place it in a standby mode (col. 10, line 66 to col. 11, line 15).

In sum, clearly Ichinohe fails to disclose receiving a communications message from a communications network addressed to the router at any one of a plurality of predetermined IP addresses of the router. Therefore, this rejection of independent claim 20 should be withdrawn, and such action is respectfully requested from the Examiner.

Independent claim 25, among many unique features also recites receiving a message from a communications network addressed to the router at any one of a plurality of IP addresses. Therefore, arguments presented with respect to claim 20 are submitted to apply with equal force to the rejection of the independent claim 25. For at least substantially the same reasons, therefore, it is appropriate and necessary for the Examiner to withdraw this rejection of independent claim 25.

Conclusion and request for telephone interview.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Request for Reconsideration Under 37 C.F.R. § 1.111  
U.S. Application No.: 09/556,517

Attorney Docket No.: Q58755

Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to be charged to Deposit Account No. 19-4880.

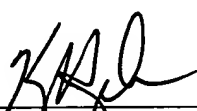
Respectfully submitted,

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WASHINGTON OFFICE

**23373**

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